

State of Kansas

Bill Graves



Governor

Department of Health and Environment

James O'Connell, Secretary

March 28, 1995

Mr. Jim Johnson
Quality Engineer
Sabreliner Independence
P.O. Box 946
Independence, Kansas 67301

Re: Hazardous Waste Compliance Inspection
EPA Identification Number: KSD981712854

Dear Mr. Johnson:

On December 21, 1994, at a meeting in my office, you presented documentation to demonstrate that you had corrected the remaining outstanding deficiencies cited during the September 28, 1994, hazardous waste compliance inspection of your facility. In a letter dated December 6, 1994, you were requested to provide the necessary documentation by December 20, 1994; however, as I was unable to meet with you on that date, the meeting was rescheduled for December 21, 1994.

Based on the information provided by you during that meeting, deficiency number 3 is ~~no longer~~ ^{never was} considered to be a violation. Deficiencies numbered 9, 10, and 12 have been satisfactorily corrected. Deficiency number 13 on the original Notice of Compliance/Non-Compliance is no longer considered to be a violation so long as the catch pan below the testing stand is not used as a hazardous waste storage container. ^{never was}

Your cooperation with the hazardous waste management program is appreciated. If you have any questions regarding the inspection, please call me at 316/431-2390.

Sincerely,

Bryce L. Tobyne

Bryce L. Tobyne
Environmental Technician
Bureau of District Operations
BLT:ps
pc: John Mitchell, BWM, Topeka
Ron Smith, BWM, Topeka ✓
SEDO, Chanute



R00157216
RCRA RECORDS CENTER

MEMORANDUM

TO: Sabreliner, Independence, File
EPA ID#: KSD981712854

FROM: Bryce Tobyne, SEDO, Chanute *BT*

RE: Follow-up inspection

On December 19, 1994, Jim Johnson of Sabreliner called to try to schedule an appointment with me on December 20, 1994, to present documentation of actions taken to correct the remaining outstanding deficiencies from the September 28, 1994, hazardous waste compliance inspection. Danell Gooch had set the deadline at December 20, 1994, to provide documentation that the deficiencies were corrected. Because I had already scheduled a TSDF inspection on the 20th, I scheduled the meeting with Jim Johnson to be held on December 21, 1994.

The results of the review of the documentation submitted by Jim Johnson are as follows:

3. No exception report filed for manifest #00016: Jim Johnson showed me the copy of the manifest signed by the TSDF. He said that the manifest had been found in another file and that it had been returned to Sabreliner within the 45 day time limit. As there is no evidence to the contrary, there was no reason to file an exception report. Thus, there is no violation.

9. No training program: Jim Johnson showed me the outline of the hazardous waste training program that had been initiated at Sabreliner. The relevant personnel have been trained, and this deficiency has been satisfactorily corrected.

10. Job titles, job descriptions, type and amount of training not documented: Jim Johnson showed me the current list of job titles and job descriptions of personnel responsible for the management of hazardous waste at the facility. The type and amount of required training was also listed for each position. This deficiency has been satisfactorily corrected.

12. Contingency plan needs to be updated to reflect the current owner and emergency coordinators at the facility: A correction page was added to the contingency plan to update the emergency coordinator list and present name of the facility. I also reviewed some proposed changes to the contingency plan which will make the plan a comprehensive environmental response plan to satisfy the requirements of RCRA, OSHA, and SPCC. I have received a copy of the comprehensive plan, but the RCRA requirements were satisfied on December 21, 1994.

Memo--To Sabreliner File
March 28, 1995
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13. Pan below testing stand needs to be marked with the words "Hazardous Waste": This deficiency was determined to be corrected in an earlier follow-up by Danell Gooch. However, after reviewing the original inspection report, I had some doubts as to whether the pan was actually a hazardous waste storage container. I asked Jim Johnson how the pan was used, and he told me that the pan was part of the testing stand and that it was used to catch drips or leaks of calibration fluid. The calibration fluid is jet fuel which is used to calibrate the jet engine fuel controls which the facility repairs. Calibration fluid which drips into the catch pan flows back into the system and does not become waste at that time. The catch pan, therefore, is not a hazardous waste accumulation or storage container and should not be marked with the words "Hazardous Waste". The calibration fluid does become a hazardous waste when it is removed from the fuel control testing system.

BLT:ps

pc: John Mitchell, BWM, Topeka
Ron Smith, BWM, Topeka ✓



RECEIVED
MAR 30 1995
Hazardous Waste Compliance
Monitoring and Enforcement Log

FORM
A

HANDLER

ID Number: K5D981712854 LDF () TSF () GEN (X) KG () SQ () TRA ()
HWM () HWB () UOM () UOB () NOT A GEN ()

Handler Name: Sabreliner Independence AT N/A CL N/A
FT 4-5-95 RCRIS 4-19-95

Street: #1 Freedom Drive City: Independence County: Montgomery

EVALUATION New ☐ Followup: Date (on site) ☐ ☐ ☐ Date (of letter) 03 28 95 Delete ☐

Date 94 09 28 Agency S Type C5E Reason 01 Person BLT District 5E

Areas of Evaluation (EV - Evaluated, NE - Not Evaluated, NA - Not Applicable)

Generator		Transporter		Treatment/Storage/Disposal Facility				Other							
GER	<input type="checkbox"/>	GPT	<input checked="" type="checkbox"/>	TGR	<input type="checkbox"/>	DCH	<input type="checkbox"/>	DGW	<input type="checkbox"/>	DMC	<input type="checkbox"/>	DPP	<input type="checkbox"/>	BRR	<input type="checkbox"/>
GGR	<input type="checkbox"/>	GRR	<input type="checkbox"/>	TMR	<input type="checkbox"/>	DCL	<input type="checkbox"/>	DIN	<input type="checkbox"/>	DMR	<input type="checkbox"/>	DSI	<input type="checkbox"/>	CAS	<input type="checkbox"/>
GLB	<input type="checkbox"/>	GSC	<input type="checkbox"/>	TOR	<input type="checkbox"/>	DCP	<input type="checkbox"/>	DLB	<input type="checkbox"/>	DOR	<input type="checkbox"/>	DTR	<input type="checkbox"/>	CSS	<input type="checkbox"/>
GMR	<input checked="" type="checkbox"/>	GSQ	<input type="checkbox"/>	TRR	<input type="checkbox"/>	DFR	<input type="checkbox"/>	DLF	<input type="checkbox"/>	DOT	<input type="checkbox"/>	DTT	<input type="checkbox"/>	FEA	<input type="checkbox"/>
GOR	<input type="checkbox"/>			TWD	<input type="checkbox"/>	DGS	<input type="checkbox"/>	DLT	<input type="checkbox"/>	DPB	<input type="checkbox"/>	DWP	<input type="checkbox"/>	ILD	<input type="checkbox"/>

Used Oil UOM ☐ UOB ☐ UTM ☐ SUM ☐ SUB ☐

COMMENTS

VIOLATION # 3 Date Determined 09 28 94
New ☐ Change ☐ Delete ☒ Comments ☐
Agency S Number 12 Area GMR Class 1 Priority 5 Type R
Regulation Citation: KAR 28-31-4(f, 4, B)
Description: Exception report not filed for manifest
Returned to Compliance #00016
Scheduled: 12 20 94
Actual: 12 21 94

VIOLATION # 9 Date Determined 09 28 94
New ☐ Change ☒ Delete ☐ Comments ☐
Agency S Number 12 Area GPT Class 1 Priority 5 Type R
Regulation Citation: KAR 28-31-4(g, 4)
Description: No hazardous waste training
Returned to Compliance
Scheduled: 12 20 94
Actual: 12 21 94

VIOLATION # 10 Date Determined 09 28 94
New ☐ Change ☒ Delete ☐ Comments ☐
Agency S Number 13 Area GPT Class 2 Priority 5 Type R
Regulation Citation: 40 CFR 265.16(d, 1-3)
Description: Job title, job descriptions, type and amount of training not documented
Returned to Compliance
Scheduled: 12 20 94
Actual: 12 21 94

VIOLATION # 12 Date Determined 09 28 94
New ☐ Change ☒ Delete ☐ Comments ☐
Agency S Number 12 Area GPT Class 2 Priority 5 Type R
Regulation Citation: KAR 28-31-4(g, 4)
Description: Contingency plan needs to be updated
Returned to Compliance
Scheduled: 12 20 94
Actual: 12 21 94

Facility Name:

Sabreliner Independence

Hazardous Waste Compliance Monitoring and Enforcement Log

FORM 3

ID Number: K5D981712854

Handler Name: Sabreliner Independence

VIOLATION # 13 **Date Determined** 07 28 94

New ☐ Change ☐ Delete ☒ Comments ☐

Agency S Number Area GPT Class 2 Priority Type JR

Regulation Citation: KAR 28-31-4(j)

Description: Container below testing stand needs to be marked "HW"

Returned to Compliance ☐

Scheduled: 10 28 94 Actual: 10 27 94

VIOLATION # **Date Determined**

New ☐ Change ☐ Delete ☐ Comments ☐

Agency S Number Area Class Priority Type

Regulation Citation:

Description:

Returned to Compliance ☐

Scheduled: Actual:

VIOLATION # **Date Determined**

New ☐ Change ☐ Delete ☐ Comments ☐

Agency S Number Area Class Priority Type

Regulation Citation:

Description:

Returned to Compliance ☐

Scheduled: Actual:

VIOLATION # **Date Determined**

New ☐ Change ☐ Delete ☐ Comments ☐

Agency S Number Area Class Priority Type

Regulation Citation:

Description:

Returned to Compliance ☐

Scheduled: Actual:

VIOLATION # **Date Determined**

New ☐ Change ☐ Delete ☐ Comments ☐

Agency S Number Area Class Priority Type

Regulation Citation:

Description:

Returned to Compliance ☐

Scheduled: Actual:

VIOLATION # **Date Determined**

New ☐ Change ☐ Delete ☐ Comments ☐

Agency S Number Area Class Priority Type

Regulation Citation:

Description:

Returned to Compliance ☐

Scheduled: Actual:

ENFORCEMENT

New ☐ Change ☐ Delete ☐

Date Number Agency S Type District Person

COVERED VIOLATIONS

Agency	Violation Number	Area	Agency	Violation Number	Area	Agency	Violation Number	Area
<u>S</u>	<u> </u>	<u> </u>	<u>S</u>	<u> </u>	<u> </u>	<u>S</u>	<u> </u>	<u> </u>
<u>S</u>	<u> </u>	<u> </u>	<u>S</u>	<u> </u>	<u> </u>	<u>S</u>	<u> </u>	<u> </u>
<u>S</u>	<u> </u>	<u> </u>	<u>S</u>	<u> </u>	<u> </u>	<u>S</u>	<u> </u>	<u> </u>
<u>S</u>	<u> </u>	<u> </u>	<u>S</u>	<u> </u>	<u> </u>	<u>S</u>	<u> </u>	<u> </u>

Comments:

PURGED
RCRA Records Center
R00076519

